



**Western
Technologies
Inc.**

The Quality People
Since 1985

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June 14, 2010

United States Environmental Protection Agency
Region 9
RCRA Corrective Action Office
Waste Management Division
Mail Code WST-5
75 Hawthorne Street
San Francisco, California 94105

Attn: Carmen D. Santos

Re: Schedule for Cap Construction
Washington Park Corporate Center
Lot 3, Trillium Residential
4400 Block of East Washington Street
Phoenix, Arizona

WT Job No. 2187JK184

As requested in our phone conversation of May 12, 2010, Western Technologies Inc. is pleased to present this proposed schedule for cap construction over PCB-impacted soils for your review and comment. Our Client, DST Realty Advisors on behalf of AIG Retirement Services, Inc., has recently received a No Further Action Determination for soil co-contaminants by the Arizona Department of Environmental Quality for the portion of the property known as the "Trench Area" at the above referenced site. At this time, the current owner/developer wants to proceed with construction of the engineered fill in the Trench Area and construction of the cap as soon as feasible. However, no action will take place until we hear from you. We have proposed to start cap construction on July 6 and submit a draft deed notice for your review no later than August 3. We are happy to provide any additional information you feel is necessary to complete your review of this proposed schedule.

If you have any questions about this amendment, feel free to contact David Regonini at Western Technologies Inc. at 602-437-3737. Thank you for your attention to our project. We look forward to your review and commentary.

Respectfully,
WESTERN TECHNOLOGIES INC.

Humberto F. Preciado, Ph.D., P.E.
Environmental Associate

David Regonini, REA
Corporate Director, Environmental Services

**WASHINGTON PARK CORPORATE CENTER, LOT 3
44TH STREET AND WASHINGTON STREET
PHOENIX, ARIZONA**

**SCHEDULE FOR CAP CONSTRUCTION
WT JOB NO. 2187JK184**

Western Technologies Inc. (WT) submits this schedule for cap construction pursuant to the requirements of the self-implementing clean-up procedures contained in 40 CFR § 761.61(a)(7) and the U.S. EPA clarification letter dated July 14, 2009.

SCHEDULE FOR CAP CONSTRUCTION

1) Survey the "Trench Area" where fill soils will be removed and the area immediately west (between the Trench Area and the proposed southeast underground retention basin) where the cap will be constructed.

2) Remove soils within the surveyed Trench Area to a depth of approximately 19 feet, where an HDPE plastic liner separates the on-site native soils from the import fill soils. This liner will be left in place or replaced as appropriate and existing import fill soils will be placed as engineered fill in lifts (layers) no greater than 10 inches. Each soil lift will be compacted to a minimum percent compaction of 100% (ASTM D698) from 19 feet below grade to 5 feet below grade. Each soil backfill lift will be compacted within a water content range of 3 percent below to 3 percent above optimum. Soil lifts from 5 feet below grade to 2 feet below grade will be compacted to a minimum percent compaction of 95% (ASTM D698) and to the water content requirement mentioned above.

3) Remove the upper 2 feet of on-site soils from the area between the Trench and the proposed southeast underground basin to match the backfilled grade at the Trench Area. Place, moisten and compact a 1.5 foot of approved soil in 6-inch lifts that meets the requirements of 40 CFR 264.310(a) and 40 CFR 761.75(b)(1)(ii) through 761.75(b)(1)(v). Each soil lift should be compacted to a minimum percent compaction of 95% (ASTM D698) and a water content range of optimum to 3 percent above optimum. Place a 6 mil polyethylene liner (plastic sheeting) on top of the cap soil barrier and subsequently place and compact 6 inches of import or native soil cover to promote drainage and minimize erosion or abrasion of the cap below. In arid or semi-arid areas such as Phoenix, a soil cover is typically recommended to prevent desiccation of the compacted clay barrier or cap (U.S. DOE, 2000). The purpose of the polyethylene liner will be to separate the cap from the soil cover on top and to facilitate inspection of the cap whenever needed.

Treatment with a dust palliative may be required at the surface of the soil cover to minimize dust resuspension and meet Maricopa County requirements while the site remains vacant and before future construction begins.

4) Resurvey the area of the final cap and place temporary markers or stakes at the corners of the capped area to prevent disturbance of the cap during future construction.



Washington Park Corporate Center, Lot 3
Schedule for Cap Construction
WT Job No. 2187JK184

- 5) Prepare exhibit map showing the location of the cap overlaid on the plat of the Washington Park Corporate Center-Lot 3, and prepare legal description for the cap area.
- 6) Prepare a Cap maintenance plan
- 7) Prepare a draft deed notice for EPA's review and approval that includes the exhibit map and specific location of the cap, as well as the cap maintenance plan.
- 8) Record the notice

ESTIMATED TIME LINE

Tasks 1 through 3 should be completed within 2 weeks of authorization of this proposed plan and schedule by EPA. Tasks 4 to 7 should be completed within 2 weeks after cap construction. Task 8 will be completed after receipt of comments and final review by EPA.

We propose to start the cap construction on July 6 and submit the draft deed notice for EPA's review no later than August 3.

REFERENCES

United States Department of Energy, 2000; Alternative Landfill Cover. Subsurface Contaminants Focus Area and Characterization. Monitoring, and Sensor Technology Crosscutting Program. Innovative Technology Summary Report DOE/EM-0558.

